

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

ALFRED PLACERES,

Case No. 15-10691 (SMB)

Debtor.

Chapter 7

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JOSE BORGES,

Plaintiff,

Adv. Proc. No. 15-01356-SMB

-against-

ALFRED PLACERES,

Defendant.

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**DECLARATION OF NORMA E. ORTIZ IN SUPPORT
OF DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

I, Norma E. Ortiz, declare as follows:

1. I am a partner of the law firm of Ortiz & Ortiz, LLP, counsel to Alfred Placeres (the "Defendant").
2. I make this Declaration to put before the Court certain documents related to the Defendant's Motions for Summary Judgment.
3. Attached to this Declaration as Exhibit 1 is a copy of excerpts from the Transcript

of Trial, Dated February 24, 2012.

4. Attached to this Declaration as Exhibit 2 is a copy of excerpts from the Transcript of Trial, Dated February 27, 2012.

5. Attached to this Declaration as Exhibit 3 is a copy of the Declaration of Defendant.

6. Attached to this Declaration as Exhibit 4 is a copy of the Declaration of Jose Luis Torres.

7. Attached to this Declaration as Exhibit 5 is a copy of the Declaration of Brian Robinson

8. Attached to this Declaration as Exhibit 6 is a copy of the Declaration of Maria Malave.

9. Attached to this Declaration as Exhibit 7 is a copy of Third Court of Appeals Decision in Plaintiff's appeal, Borges v. Gonzales, 402 F.3d 398, 409 (3d Cir. 2005).

10. Attached to this Declaration as Exhibit 8 is a copy of Disciplinary Committee Letter Dated October 7, 2013.

11. Attached to this Declaration as Exhibit 9 is a copy of Admonition from Disciplinary Committee Dated July 22, 2015.

12. Attached to this Declaration as Exhibit 10 is a copy of February 2012 Consent to Change Attorneys for Defendant dated February 20, 2012.

13. Attached to this Declaration as Exhibit 11 is a copy of March 2, 2012, Jury Verdict Sheet from trial.

14. Attached to this Declaration as Exhibit 12 is a copy of excerpts from Defendant's

Rule 2004 Examination of August 25, 2015.

15. Attached to this Declaration as Exhibit 13 is a copy of Denial of Motion to
Reopen dated March 10, 2003.

Dated: May 27, 2016
Queens, New York

/s/Norma E. Ortiz
Norma E. Ortiz
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